

EXHIBIT "A"

KATHERINE J. ODENBREIT
Direct Dial: (949) 610-0680
E-mail: odenbreit@huntortmann.com
3732.030



Attorneys At Law

Hunt
Ortman
Palffy
Nieves
Darling
& Mah,
Inc.

April 15, 2013

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Conair Corporation
c/o C T Corporation System
818 W. Seventh Street
Los Angeles, CA 90017

**Re: Notice of Violation of the California Consumer Legal Remedies Act
(California Civil Code Section 1750 et seq.) Related to the Conair Pro
Infinity 1875 watt Salon Performance Hair Dryer**

To Whom it May Concern:

PLEASE TAKE NOTICE: on behalf of Cindy Czuchaj ("Plaintiff"), and all others similarly situated, this letter is to notify Conair Corporation ("Conair") that it has violated the California Consumer Legal Remedies Act ("CLRA") by employing or committing methods, acts or practices declared unlawful by California Civil Code §1770 related to the *Infiniti Pro* 1875 watt Salon Performance hair dryer manufactured and sold by Conair within the United States. The *Infiniti Pro* hair dryer has component parts that are defective in materials and/or workmanship under normal intended use. Well within the stated warranty period, the device during normal use sparks and/or catches fire creating a danger of causing serious injury which threatens the safety of consumers. If Conair fails to respond to this notice within 30 days of the date of this letter as provided herein, Plaintiff intends to file a complaint seeking damages under the CLRA, as well as other applicable California and federal laws.

STATEMENT OF VIOLATIONS

Specifically, it is alleged that Conair represents to consumers through its advertising and website that the "ceramic technology" used in the manufacture of the *Infiniti Pro* dryer "helps to provide uniform heating to safely dry" hair. Conair further represents to consumers the AC motor used in the *Infiniti Pro* hair dryer "can provide up to 3 time longer dryer life". These statements are false because within the 4 year manufacture warranty period, typically within 1-2 years of normal, intended use, the dryer can spark and/or catch fire causing the motor to cease to function. *Cal.Civ. Code §1770(a)(5) and (7)*. The unlawful acts committed by Conair, in violation of the CLRA, include but are not limited to, marketing and selling *Infiniti Pro* hair dryers without disclosing material facts, namely that the *Infiniti Pro* hair dryer can spark and catch fire during normal use and that Plaintiff and consumers are being exposed to danger of

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bodily injury or damage to property while using Conair's product. Conair had actual knowledge that the *Infiniti Pro* dryer can spark and/or catch fire, had a duty to disclose this known defect and Plaintiff and consumers relied on Conair's lack of warning or notice and statements that the dryer safely dries hair. As a result, Conair has made and continues to make a profit from the advertising, marketing and sale of these defective products.

Conair's conduct also constitutes violations of the Magnuson-Moss Warranty Act, 15 U.S.C. §2301, *et seq.* and breach of express warranties on your product.

STATEMENT OF REMEDIES

IT IS HEREBY DEMANDED THAT WITHIN THIRTY (30) DAYS from the date of this Notice you remedy these violations as follows:

- A. Identify or make reasonable attempts to identify all consumers who purchased an *Infiniti Pro* hair dryer with the past four years.
- B. Notify all consumers described above that upon request, Conair will provide a full refund for the purchase of the *Infiniti Pro* hair dryer;
- C. Notify all consumers described above that upon request and reasonable proof, Conair will pay for all injuries to persons and/or property that resulted from use of the defective *Infiniti Pro* hair dryer;
- D. Undertake (or promise to undertake within a reasonable time if it cannot be done immediately) the actions described above for all affected consumers.
- E. Initiate a voluntary recall of the *Infiniti Pro* hair dryers.
- F. Pay Plaintiff's attorneys' fees and costs.

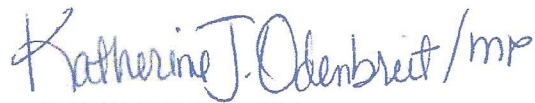
Please direct all communications and responses regarding this notice to Ms. Czuchaj's counsel:

Katherine J. Odenbreit, Esq.
Hunt Ortmann Palffy Nieves Darling & Mah, Inc.
301 N. Lake Avenue, 7th Floor
Pasadena, CA 91101
Tel: (626)440-5200
Email: odenbreit@huntortmann.com

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If we do not hear from you within 30 days of the date of this notice, we will promptly file a complaint seeking damages under the CLRA, in addition to other related causes of action. We await your response.

Very truly yours,


KATHERINE J. ODENBREIT

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HUNT ORTMANN PALFFY
NIEVES DARLING & MAH, INC.
301 NORTH LAKE AVENUE, 7TH FLOOR
PASADENA, CALIFORNIA 91101-1807
Tel (626) 440-5200 • Fax (626) 796-0107

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 301 North Lake Avenue, 7th Floor, Pasadena, CA 91101-1807.

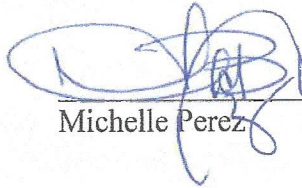
On April 15, 2013, I served the following document(s) described as **NOTICE OF VIOLATION OF CALIFORNIA CONSUMER LEGAL REMEDIES ACT (CALIFORNIA CIVIL CODE SECTION 1750 ET SE.) RELATED TO THE CONAIR PRO INFINITY 1875 WATT SALON PERFORMANCE HAIR DRYER** on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as follows:

Conair Corporation
c/o C T Corporation System
818 W. Seventh Street
Los Angeles, CA 90017

BY CERTIFIED/RETURN RECEIPT REQUESTED MAIL: I am "readily familiar" with Hunt Ortmann Palffy Nieves Darling & Mah, Inc.'s practice for collecting and processing correspondence for mailing via certified/return receipt requested mail with the United States Postal Service. Under that practice, it would be deposited with the United States Postal Service that same day in the ordinary course of business. Such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at Pasadena, California, on that same day following ordinary business practices.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 15, 2013, at Pasadena, California.


Michelle Perez

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

*For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$.66
Certified Fee	3.10
Return Receipt Fee (Endorsement Required)	2.55
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$6.31

PASADENA, CA
 APR 15 2014
 Postmark Here
 MF
 USPO
 KJO/mp

Sent To **Conair Corporation**
c/o C T Corporation System
 Street, Apt. No.,
 or PO Box No. **818 W Seventh Street**
 City, State, ZIP+4®
Los Angeles, CA 90017

PS Form 3800, August 2006 See Reverse for instructions

7012 0470 0000 4884 9332

SENDER: COMPLETE THIS SECTION	COMPLETE THIS SECTION ON DELIVERY
<ul style="list-style-type: none"> ■ Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. ■ Print your name and address on the reverse so that we can return the card to you. ■ Attach this card to the back of the mailpiece, or on the front if space permits. 	<p>A. Signature X <i>Rudy Rivera</i> <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p> <p>B. Received by (Printed Name) C. Date of Delivery <i>RUDY RIVERA</i></p> <p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>
<p>1. Article Addressed to:</p> <p style="text-align: center;">Conair Corporation c/o C T Corporation System 818 W Seventh Street Los Angeles, CA 90017</p>	<p>3. Service Type <input checked="" type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>
<p>2. Article Number (Transfer from service label)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>
<p>7012 0470 0000 4884 9332</p>	
<p>PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-1540</p>	